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Attorneys for Defendants  
FAST WATER HEATER PARTNERS I, LP DBA  
FAST WATER HEATER COMPANY, FWH  
ACQUISITION COMPANY, LLC DBA FAST  
WATER HEATER COMPANY; JEFFREY DAVID  
JORDAN; AND JASON SPARKS  
HANLEYBROWN

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

MIHAIL SLAVKOV, NIKOLA  
VLAOVIC AND MARTIN ARNAUDOV,  
individually and on behalf of those  
similarly situated,

Plaintiffs,

v.

FAST WATER HEATER PARTNERS I,  
LP dba Fast Water Heater Company, a  
Delaware Limited Partnership; FWH  
ACQUISITION COMPANY, LLC dba  
Fast Water Heater Company, a Delaware  
Limited Liability Company; JEFFREY  
DAVID JORDAN, an individual; and  
JASON SPARKS HANLEYBROWN, an  
individual,

Defendants.

Case No. CV 14-4324 JST

**STIPULATION AND ~~PROPOSED~~  
ORDER GRANTING CONTINUANCE OF  
THE CLASS CERTIFICATION BRIEFING**

**STIPULATION AND REQUEST FOR A CONTINUANCE**

Plaintiffs MIHAIL SLAVKOV, NIKOLA VLAOVIC and MARTIN ARNAUDOV (“Plaintiffs”) and Defendants FAST WATER HEATER PARTNERS I, LP dba FAST WATER HEATER COMPANY, FWH ACQUISITION COMPANY, LLC dba FAST WATER HEATER COMPANY; JEFFREY DAVID JORDAN; and JASON SPARKS HANLEYBROWN (“Defendants”) (collectively, “Parties”), stipulate to and request an order continuing the current class certification briefing schedule by 45 days. This additional time will enable the Parties to focus their time and resources towards ongoing settlement communications as part of the Court’s ADR program. The parties are concerned that unless there is a continuance of the certification briefing schedule, their settlement efforts may be hindered by the necessity of devoting all of their time and litigation resources to class certification briefing. If the Court extends the schedule, the Parties have agreed that there will be a corresponding stay of discovery and a tolling of the statute of limitations on the claim brought under the Fair Labor Standards Act (“FLSA”).

This stipulation and proposed order is made on the following facts. The Parties attended an early mediation in May 2015 before a private mediator. On January 19, 2016, the Parties attended a second mediation, this time a day-long mediation with Arthur R. Siegel, the Court-assigned Mediator to this matter. The Parties did not resolve the litigation at the mediation, but settlement discussions are ongoing. The parties are facing substantial immediate discovery and briefing efforts including the depositions of the named lead class members, additional written discovery, Plaintiffs’ discovery motion relating to the Defendant’s deposition and written discovery, a class certification motion and perhaps other motions.

Accordingly, the Parties request that this Court grant a 45 day continuation of the class certification deadlines, as set forth below

Event	Deadline
Plaintiffs’ motion for class certification	<del>February 26, 2016</del> April 15, 2016
Defendants’ opposition to class certification	<del>March 25, 2016</del> May 16, 2016
Plaintiffs’ reply brief re class certification	<del>April 8, 2016</del> May 30, 2016

Hearing on class certification

~~May 26, 2016~~ June 30, 2016 at 2:00 p.m.

The parties also request that for the next 45 days, the statute of limitations relating to FLSA claims of putative class members is tolled and discovery (including discovery motions) is stayed.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED: January 26, 2016

**PERKINS COIE LLP**

By: /s/ Jonathan S. Longino

Sue J. Stott  
Jonathan S. Longino  
Aaron J. Ver

Attorneys for Defendants  
FAST WATER HEATER PARTNERS I, LP  
DBA FAST WATER HEATER COMPANY,  
FWH ACQUISITION COMPANY, LLC  
DBA FAST WATER HEATER COMPANY;  
JEFFREY DAVID JORDAN; AND JASON  
SPARKS HANLEYBROWN

DATED: January 26, 2016

**WOODALL LAW OFFICES  
DOUGLAS LAW OFFICES  
BARNES LAW OFFICES**

By: /s/ Kevin F. Woodall

Kevin F. Woodall

Attorneys for Plaintiffs  
MIHAIL SLAVKOV, NIKOLA VLAOVIC  
AND MARTIN ARNAUDOV

1           ~~[PROPOSED]~~ ORDER

2           The Parties' stipulation, request for a continuance, and revised case management schedule  
3 are adopted. IT IS SO ORDERED.

4           DATED: January 27, 2016

5             
6           The Honorable Jon S. Tigar  
7           UNITED STATES DISTRICT JUDGE